

ISAAC PARK

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June 26, 2025

**Via ECF**

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Chang v. Chang*, No. 25-CV-4917-PAE  
Requested Information Regarding Removal Jurisdiction

Judge Engelmayer:

Pursuant to the Court's Notice of Initial Pretrial Conference (Dkt. No. 6), Defendant Michael Chang writes to supply the requested information:

1. Defendant Michael Chang—the sole defendant in this suit—was indeed joined in the notice of removal. *See* 28 U.S.C. § 1446(b)(2)(A).
2. Defendant received a copy of Plaintiff's state court filings on June 9, 2025. *See id.* § 1446. He filed the notice of removal two days later, on June 11, 2025.
3. There is complete diversity. Plaintiff (an individual) is a citizen of the Commonwealth of Pennsylvania, and Defendant (an individual) is a citizen of the State of New York.

Dated: June 26, 2025  
New York, NY

Respectfully submitted,

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/s/ Isaac Park

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*Attorney for Defendant*

cc: All Counsel of Record (via ECF)